

**UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

DEWBERRY ENGINEERS INC.,)	
)	
Plaintiff,)	
)	
v.)	
)	Civil Action No. 1:20-cv-610-LO-IDD
DEWBERRY GROUP, INC. F/K/A)	
DEWBERRY CAPITAL CORPORATION,)	
)	
Defendant.)	
)	
)	
)	

DEWBERRY ENGINEERS INC.’S
MOTION TO FILE ITS OPPOSITION BRIEF UNDER SEAL

Contemporaneously with this Motion, Plaintiff Dewberry Engineers Inc. (“Dewberry”) filed its Opposition to Defendant’s Proposed Findings of Fact and Conclusions of Law (hereinafter its “Opposition Brief”) following the bench trial on the quantum of damages to be awarded to Dewberry. Because Dewberry’s Opposition Brief recounts exhibits and testimony that Defendant Dewberry Group, Inc. had previously designated as “Confidential” or “Highly Confidential” pursuant to the Protective Order in this case [Dkt. No. 31], Dewberry has redacted that information in the publicly filed version of its Opposition Brief and hereby seeks permission to file an unredacted version under seal. The Memorandum accompanying this Motion provides a more detailed description of the redacted information.

Dewberry takes no position on either the propriety of any of Dewberry Group’s confidentiality designations or the period of time, if any, for which the documents should be sealed. As noted in the accompanying memorandum, Dewberry presumes that Dewberry Group

will file a response called for by Local Civil Rule 5(C) within seven days if it wishes Dewberry's filing to remain under seal.

Dated: January 20, 2022

Respectfully submitted,

DEWBERRY ENGINEERS INC.

By Counsel

By: /s/ Arthur E. Schmalz

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CERTIFICATE OF SERVICE

I hereby certify that on January 20, 2022 I caused a copy of the foregoing to be electronically filed using the CM/ECF system, which will send notification to counsel of record of such filing by operation of the Court's electronic system. Parties may access this filing via the Court's electronic system.

By /s/ Arthur E. Schmalz